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February 20, 2013

Ashley Carter  
Reports Analysis, Federal Election Commission

RE: Washoe County Republican Party  
Committee Id #C00523886

Reports: September Monthly Report (8/1/12 - 8/31/12) 1 Item  
Amended Oct Monthly (9/1/12 - 9/30/12) 2 Items  
12-Day Pre-General (10/1/12 - 10/17/12) 1 Item

Dear Ms. Carter:

We are in receipt of your letters regarding the aforementioned reports. Per our conversation, this one letter is acceptable to address the items in question for each of those report questions.

In regard to the item for the September Monthly report: the disbursements reported on Schedule B, line 30 as 'printing', were exempt activity because: no public advertising was used, no commercial vendor was used for any lists or distribution of the materials - this was an intensely volunteer driven project. Additionally, none of the funds used to pay for these expenses were designated to or for any specific candidate or specifically designated to or for this activity. Additionally, none of the funds received from the National Committee were designated for any particular use, nor were any of the transferred funds received by our committee used to specifically fund any specific federal activity. Therefore, these do not require disclosure as an inkind, independent expenditure, or coordinated party expenditure and accordingly no amendment is required for this item.

In regard to items for the Amended October Monthly report: Item 1) the disbursements reported as 'printing/exempt', were indeed exempt activity. These expenses were for printing of campaign materials in which no public advertising was used, no commercial vendor was used for any lists nor distribution of the materials - these were intensely volunteer driven projects. None of the funds used to pay for these expenses were designated for any specific candidate or specifically designated for this activity. Additionally, none of the funds received from the National Committee were designated for any particular use, nor were any of the transferred funds received by our committee used to specifically fund any specific federal activity. Therefore, these do not require disclosure as an inkind, independent expenditure, or coordinated party expenditure and accordingly no amendment is required for this item. Item 2) please be advised that we did not have any employees during these times in questions. Our staff was comprised of volunteers as well as a few independent contractors, we had no employees. Therefore, the payments to the contractors were allocated and reflected on schedule H4 and accordingly no amendment is required for this item.

In regard to the item for the 12 Day Pre-General report: the disbursements reported as 'printing/exempt slate card", do meet the conditions for exempt activity - the names of at least 3 candidates running for election were named, this information was not distributed through any public advertising, the content was strictly limited to the identification of the candidate named, the office sought. This activity was paid with 100% federal funds, and None of the funds used to pay for these expenses were designated to or for any specific candidate or specifically designated to or for this activity. Additionally, none of the funds received from the National Committee were designated for any particular use, nor were any of the transferred funds received by our committee used to specifically fund any specific activity. Therefore, these do not require disclosure as an inkind, independent expenditure, or coordinated party expenditure and accordingly no amendment is required for this item.

At this time our committee believes to be in compliance.

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Washoe County Republican Party

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